

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-239-E

In the Matter of:

**Dominion Energy South Carolina,
Inc.'s Request for Approval of an
Expanded Portfolio of Demand Side
Management Programs and a
Modified Demand Side
Management Rate Rider**

)
)
) SURREBUTTAL TESTIMONY OF
) EDDY MOORE ON BEHALF
) OF SOUTH CAROLINA COASTAL
) CONSERVATION LEAGUE,
) SOUTH CAROLINA NAACP, AND
) SOUTHERN ALLIANCE FOR
) CLEAN ENERGY
)
)

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.

A. My name is Eddy Moore and my business address is 131 Spring Street, Charleston, SC. I am the Energy and Climate Program Director for the South Carolina Coastal Conservation League ("CCL").

Q. HAVE YOU TESTIFIED BEFORE THIS COMMISSION?

A. No.

Q. PLEASE DESCRIBE YOUR ROLE, AS IT RELATES TO THIS PROCEEDING.

A. I represent CCL's interest in the implementation of utility-funded energy efficiency programs, and more generally in sound utility planning, policy, and ratemaking. I am the CCL representative to the Dominion Energy South Carolina, Incorporated ("DESC") Energy Efficiency Advisory Group referenced in the testimonies of DESC Witnesses Raftery and Griffin.

1 **Q. PLEASE DESCRIBE YOUR BACKGROUND.**

2 A. For six years, from 2010 through most of 2016, I was an attorney advisor to the three-
3 member Arkansas Public Service Commission. My role was to help prepare for hearings,
4 evaluate testimony in cases of all types, and produce draft Commission orders for consideration
5 and ultimate issuance by the Commission. One of my major projects in that role included
6 helping to establish procedures that resulted in the significant expansion of energy efficiency
7 programs among Commission-regulated electric and natural gas utilities in Arkansas.

8 In late 2016, I returned to my home state of South Carolina to serve as the Energy and
9 Climate Program Director at CCL. I routinely serve as the point of contact for CCL as an
10 intervenor before this Commission. I was also an active participant in the drafting and recent
11 passage of the Energy Freedom Act.

12
13 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

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15 A. The purpose of my testimony is to clarify for the Commission the nature of my
16 participation in the Energy Efficiency Advisory Group, in light of the fact that DESC witnesses
17 have referenced my participation as one reason that the Commission should accept the
18 proposition that its *Dominion Energy 2020-2029 Achievable DSM Potential and PY10-PY14*
19 *Program Plan Final Report* defines the amount of energy savings that DESC can and should
20 pursue during the next 5 years.

21 **Q. DID YOU GENERALLY PARTICIPATE IN THE ADVISORY GROUP OVER**
22 **THE PAST THREE YEARS?**

23 A. Yes. Sometimes by phone, sometimes in person. I have greatly appreciated the
24 opportunity to participate, although I may not have participated in all the meetings.

1 **Q. DO YOU HAVE PREVIOUS EXPERIENCE WITH POTENTIAL STUDIES**
2 **SIMILAR TO DESC’S?**

3 A. Yes. I have closely studied several potential studies and have followed program
4 implementation after the potential study. On that point, I understand that a potential study is an
5 estimate based on numerous assumptions. Some are better than others, and I have witnessed
6 utilities out-perform even a good potential study in the real world.

7 **Q. IS IT TRUE THAT THE DESC POTENTIAL STUDY WAS THE PRODUCT OF**
8 **“EXTENSIVE COLLABORATION” IN THE ADVISORY GROUP?**

9 A. I will conclude by saying “no,” but I want to be specific so as not to be misunderstood.
10 In November 2018, the Advisory Group was provided a spreadsheet with a list of every energy
11 efficiency measure (such as more insulation or a specific type of efficient light bulb). We were
12 asked if any measures should be added. I shared the list with several people who I thought could
13 offer insight and reported to DESC by the end of that month that the list looked good. In April
14 2019, Ms. Griffin invited me to the upcoming April 25, 2019 Advisory Group, noting that DESC
15 would be sharing results of its Potential Study. She also noted that representatives from ICF and
16 Opinion Dynamics Corp. would present their findings.

17 I responded by e-mail that same day to ask if DESC might be able to share slides or a
18 draft report with us in advance to review and prepare for discussion. A day later, Ms. Griffin
19 responded and stated that neither of these items would be presented to the Advisory Group prior
20 to the Advisory Group meeting.

21 At the April 25, 2019 meeting, a presentation was shared, but not the Potential Study
22 itself. I praised the inclusion of natural gas savings within the TRC calculations, thanked DESC
23 for a greater emphasis on building envelope improvements, and learned that DESC had taken my

1 suggestion to explore a “midstream approach” to residential HVAC as a way to increase measure
2 adoption and program efficiency. DESC, however, declined to implement a midstream
3 approach, stating that HVAC contractors had indicated that they feared splitting the rebates with
4 equipment suppliers. I still believe that this approach is not only workable, but also a more
5 efficient way to use ratepayer money. Independent of my own views, Ms. Chant came up with
6 the same recommendation.

7 **Q. DID YOU CONVEY CONCERNS TO DESC BASED ON THE APRIL 25**
8 **PRESENTATION?**

9 A. Yes. I asked for more information regarding the basis of the assumption that only 20% of
10 residential ductwork was leaky enough to warrant sealing. The answer seemed to be that it was a
11 “rule of thumb” rather than being based on any technical survey. I raised what I believe is a very
12 serious concern: that a “walk through audit” program like Home Energy Checkup does not
13 provide a full energy audit, therefore customers can be left with an inefficient home and not
14 know it because they think they have had a comprehensive energy audit conducted.

15 I also raised questions about the basis of the estimate of the magnitude of savings
16 available through commercial programs, which seemed overly limited to me. In fact, the
17 Potential Study (page 27) indicates that commercial programs will deliver energy savings at a
18 total cost of less than 3 cents per kilowatt hour and will save almost \$2 for all ratepayers for each
19 \$1 spent (page 53). These ICF estimates tend to bolster the point I raised in the Advisory Group.

20 The underlying theme among my concerns is that it is not sufficient to merely have a
21 measure listed for consideration, or even included in a potential study or a program. Including
22 measures on a list does not ensure their adoption, but proper program design will. For instance,
23 when an air conditioner fails (as they usually do) on a hot afternoon, it is hard to get the customer

1 to seal ducts or improve insulation as part of the decision to buy a new air conditioner, partly
2 because these steps take extra time and analysis (not to mention money). Taking those steps can
3 actually reduce the size of air conditioner that is needed in some cases and lead to both greater
4 comfort and less energy usage, and over time, cost savings. If these issues are not addressed in
5 some way at that moment, they may go unaddressed for the full 15-year life of the next air
6 conditioner. Evidence of a commitment to deliver programs that solve these kind of real-world
7 problems goes beyond the potential study itself, but is fundamental to the question of whether the
8 potential study actually describes the potential magnitude of savings. I was concerned that I was
9 not seeing that evidence.

10 **Q. PLEASE SUMMARIZE YOUR VIEW ABOUT WHETHER CCL SUPPORTS**
11 **THE POTENTIAL STUDY AND YOUR INVOLVEMENT IN ITS PRODUCTION.**

12 A. CCL did not “extensively collaborate” in the production of the Study, but I did provide
13 both positive and constructive comments when requested on behalf of CCL. I do not think it is
14 practical to expect a close technical review based on a meeting with power point presentations
15 prior to the availability of the draft report. I genuinely enjoy working with Ms. Griffin and Mr.
16 Raftery. I made my view very clear, however, that I believe the level of savings represented in
17 the Potential Study is insufficient, particularly given the rich financial incentives sought by
18 DESC in this case. I fully support financially rewarding DESC for saving energy. But the
19 rewards should be modest for modest achievement, and should be higher for a higher level of
20 achievement, as indicated in the testimony of Ms. Chant.

21 **Q. DO YOU HAVE ANY CLOSING THOUGHTS?**

22 A. Yes. A little over three months from now, DESC will file an Integrated Resource Plan
23 (“IRP”) reflecting its plans over the next 15 years. That IRP must comply with the Energy

Freedom Act, which requires inclusion of a “high, medium, and low” case for energy efficiency and renewable energy. Even if the Commission accepts DESC’s Potential Study as adequate evidence to support its proposed program portfolio, I urge the Commission not to make a factual finding that the Potential Study defines the outer limits of cost-effective energy efficiency that can be implemented to save ratepayers money in DESC’s territory over the next five years (as reflected in the program plan) or ten years (as reflected in the Potential Study). DESC will file several IRPs in the years covered by this Potential Study, and it is both premature and factually incorrect to make any finding now that tends to limit the energy efficiency and other demand side management options that should be considered in those future proceedings.

Q. DOES THAT CONCLUDE YOUR TESTIMONY?

A. Yes.